

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MIND MEDICINE (MINDMED) INC.,

Plaintiff,

v.

SCOTT FREEMAN, JAKE FREEMAN, CHAD
BOULANGER, FARZIN FARZANEH, VIVEK
JAIN, ALEXANDER WODKA, and FCM MM
HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-07875 (DLC)

DECLARATION OF L. REID SKIBELL, ESQ.

I, L. Reid Skibell, declare as follows:

1. I am a member of the bar of the State of New York and am admitted to practice before this Court. I am an attorney with Glenn Agre Bergman & Fuentes LLP, attorneys for Scott Freeman, Jake Freeman, Chad Boulanger, Farzin Farzaneh, Vivek Jain, Alexander Wodka, and FCM MM Holdings, LLC.

2. Attached as Exhibit A is a true and correct copy of the Separation Agreement, dated August 31, 2020, entered into between Dr. Scott Freeman and Mind Medicine (MindMed) Inc.

3. Attached as Exhibit B is a true and correct copy of the complaint filed in the action captioned *Mind Medicine (MindMed) Inc. v. Scott Freeman and FCM MM Holdings, LLC*, Case No. A-23-874611-C, in the Eighth Judicial District Court, Clark County, Nevada.

4. Attached as Exhibit C is a true and correct copy of the Removal Notice filed in the action captioned *Mind Medicine (MindMed) Inc. v. Scott Freeman and FCM MM Holdings, LLC*, No. 2:23-cv-01354 (D. Nev. 2023).

5. Attached as Exhibit D is a true and correct copy of the Declaration of Mark R. Sullivan, dated September 13, 2023, filed in support of defendant's Motion to Transfer in the action captioned *Madeline Feldman v. Mind Medicine, Inc.*, No. 1:23-cv-06169 (S.D.N.Y. 2023).

6. Attached as Exhibit E is a true and correct copy of an email from L. Reid Skibell to Kaitlan Kennely, dated October 12, 2023.

7. Attached as Exhibit F is a true and correct copy of defendant's Motion to Transfer in the action captioned *Madeline Feldman v. Mind Medicine, Inc.*, No. 1:23-cv-06169 (S.D.N.Y. 2023).

8. Attached as Exhibit G is a true and correct copy of defendant's Anti-SLAPP motion in the action captioned *Mind Medicine (MindMed) Inc. v. Scott Freeman and FCM MM Holdings, LLC*, No. 2:23-cv-01354 (D. Nev. 2023).

9. Attached as Exhibit H is a true and correct copy of a Notice of Immediate Termination of Consulting Agreement, dated July 10, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on November 7, 2023, in New York, New York

By: /s/ L. Reid Skibell
L. Reid Skibell